

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

IN RE RESIDENTIAL CAPITAL, LLC,
et al.,
Debtors.

Case No. 12-12020 (MG)
Chapter 11
Jointly Administered

Objection Date: January 25, 2016 @ 4:00 p.m. (ET)
Hearing Date: February 10, 2016 @ 10:00 a.m. (ET)

**NOTICE OF MOTION BY PLAINTIFFS LANDON ROTHSTEIN, ET AL., PURSUANT
TO FED. R. BANKR. P. 7023 AND 9019 FOR AN ORDER: (I) PRELIMINARILY
APPROVING THE CLASS ACTION SETTLEMENT WITH RESPECT TO
PLAINTIFFS' BANKRUPTCY PROOFS OF CLAIM, (II) CERTIFYING THE
SETTLEMENT CLASS AND APPOINTING CLASS REPRESENTATIVES AND CLASS
COUNSEL FOR PURPOSES OF THE SETTLEMENT, (III) APPROVING THE FORM
AND MANNER OF NOTICE TO THE CLASS, (IV) SCHEDULING A FAIRNESS
HEARING, AND (V) APPOINTING A SETTLEMENT ADMINISTRATOR**

PLEASE TAKE NOTICE that, on January 11, 2016, claimants Landon Rothstein, Jennifer Davidson, Robert Davidson, and Ihor Kobryn (collectively, the “Named Plaintiffs”), on behalf of themselves and similarly situated class members, filed the unopposed motion pursuant to Fed. R. Bankr. P. 7023 and 9019 for an order: (i) preliminarily approving the class action settlement with respect to Claim No. 4074 (against GMAC Mortgage, LLC) and No. 3966 (against Residential Capital, LLC), (ii) certifying the settlement class and appointing class representatives and class counsel for purposes of the settlement, (iii) approving the form and manner of notice to the class, (iv) scheduling a fairness hearing, and (v) appointing a settlement administrator (the “Motion”).

PLEASE TAKE FURTHER NOTICE that a hearing to consider the relief requested in the Motion (the “Preliminary Hearing”) shall be held before the Honorable Martin Glenn, United States Bankruptcy Judge, at the United States Bankruptcy Court for the Southern District of New

York, Courtroom 501, One Bowling Green, New York, New York 10004 (the “Bankruptcy Court”) on February 10, 2016 at 10:00 a.m. (prevailing Eastern time), or as soon thereafter as counsel may be heard.

PLEASE TAKE FURTHER NOTICE that any objection to the preliminary relief requested in the Motion to be considered at the Preliminary Hearing must be in writing, conform to the Federal Rules of Bankruptcy Procedure, the Local Bankruptcy Rules for the Southern District of New York and shall be filed with the Bankruptcy Court electronically in accordance with General Order M-399 (General Order M-399 and the User’s manual for the Electronic Case Filing System can be found at www.nysb.uscourts.gov, the official website for the Bankruptcy Court) by registered users of the Bankruptcy Court’s case filing system, and by all other parties in-interest, on a 3.5 inch disk or CD-ROM, preferably in Portable Document Format, WordPerfect or any other Windows-based word processing format (with a hard copy delivered directly to Chambers) and served in accordance with General Order M-399 and in accordance with this Court’s order, dated May 23, 2012, implementing certain notice and case management procedures [Docket No. 141], so as to be received no later than January 25, 2016 at 4:00 p.m. (prevailing Eastern Time) (the “Objection Deadline”).

PLEASE TAKE FURTHER NOTICE that if no objection to the preliminary relief requested in the Motion is timely filed and served, the Bankruptcy Court may enter an order granting the preliminary relief requested in a Motion without further notice or opportunity to be heard afforded to any party.

Dated: January 11, 2015
New York, New York

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